

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Hearing Date: November 29, 2005
Objection Deadline: November 23, 2005 at 4:00 p.m.

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| In re | : Chapter 11 |
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| DELPHI CORPORATION, <u>et al.</u> , | : Case No. 05-44481 (RDD) |
| | : |
| Debtors. | : (Jointly Administered) |
| | : |
| -----X | |

NOTICE OF MOTION OF LEAD PLAINTIFFS FOR A LIMITED MODIFICATION OF THE AUTOMATIC STAY

PLEASE TAKE NOTICE that on November 15, 2005, Teachers' Retirement System Of Oklahoma, Public Employees' Retirement System Of Mississippi, Raiffeisen Kapitalanlage-Gesellschaft m.b.H. and Stichting Pensioenfonds ABP (collectively, the "Lead Plaintiffs"), the court-appointed Lead Plaintiffs in the securities class action entitled *In re Delphi Corp. Securities Litigation*, Master File No. 1:05-CV-2637 (NRB)(SDNY), filed the Motion For A Limited Modification Of The Automatic Stay (the "Motion") seeking an order modifying the automatic stay as to debtor Delphi Corporation ("Delphi", or the "Debtor") to permit the Lead Plaintiffs to obtain a copy of all documents and materials Delphi has produced or provided, in connection with any inquiries or investigations relating to Delphi's accounting practices or business affairs, to any of the following: (a) the Executive branch of the United States Government (including but not limited to the United States Department of Justice and the Securities and Exchange Commission) or (b) Wilmer, Cutler, Pickering, Hale & Dorr in connection with its representation of the Special Investigative Committee of Delphi's Board of Directors; including, without limitation, the documents described in paragraph 5 of the Motion.

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Motion will be held on November 29, 2005, at 10:00 a.m. (Prevailing Eastern

Time) (the "Hearing") before the Honorable Robert D. Drain, U.S.B.J. for the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion, if any, must be in writing, shall conform to the Federal Rules of Bankruptcy and shall be filed with this Court electronically in accordance with General Order M-242, by registered users of the filing system and by all other parties in interest, on a 3.5 inch disk, Document Format ("PDG"), Word Perfect or any other Windows-based system (along with a hard copy delivered directly to Chambers), and shall be served in accordance with General Order M-242 and with the October 14, 2004 Case Management Order entered in this case and upon the undersigned attorneys for the Lead Plaintiffs, on November 23, 2005.

PLEASE TAKE FURTHER NOTICE that only those objections made in writing and timely filed and received by the Objection Deadline will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set for herein, the Bankruptcy Court may enter a final order granting the Motion **without further notice**.

Dated: November 15, 2005

Respectfully submitted,

LOWENSTEIN SANDLER PC

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